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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

JEFFREY BERK, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

COINBASE, INC., a Delaware
Corporation d/b/a Global Digital Asset
Exchange ("GDAX"), Brian Armstrong
and David Farmer,

Defendants.

Case No.: 3:18-cv-01364-VC

**STIPULATION AND [PROPOSED]
SCHEDULING ORDER REGARDING
SECOND AMENDED CLASS ACTION
COMPLAINT**

Judge: Hon. Vince Chhabria
Courtroom: Courtroom 4 - 17th Floor

Pursuant to the Court's order regarding the Amended Complaint, Plaintiff was granted until November 13, 2018 to file his Second Amended Complaint. Plaintiff is working to put together the information that the Court indicated would be helpful to pleading and explaining the applicable facts and context of the asserted claims. The parties have conferred and agreed upon a schedule that provides an additional seven days to complete this work.

The parties further conferred on the schedule for briefing the motions that Defendant will likely file in response, taking into account that the Thanksgiving, Hanukkah, Christmas and New Year's holidays will be included in the respective response times.

Plaintiff Jeffrey Berk and Defendants Coinbase, Inc., Brian Armstrong and David Farmer by and between their undersigned counsel, hereby stipulate as follows:

1. Pursuant to Order of the Court dated October 23, 2018, Plaintiff may file a Second Amended Class Action Complaint, which shall be filed on or before November 20, 2018;
2. Defendants' response, whether by answer or one or more responsive motions (e.g., to dismiss under Rule 12 of the Federal Rules of Civil Procedure and/or to compel arbitration), is due by December 20, 2018;
3. Plaintiff's opposition(s) to Defendants' motion(s) shall be due by January 17, 2018.
4. Defendants' reply brief(s) in support of their motion(s) shall be due by January 31, 2019.
5. A hearing on Defendants' motion(s) shall be scheduled on February 14, 2019 at 10:00 a.m.

DATED: November 6, 2018

GREEN & NOBLIN, P.C.

By: /s/ Robert S. Green
Robert S. Green

Attorneys for Plaintiff

DATED: November 6, 2018

KEKER, VAN NEST & PETERS LLP

By: /s/ STEVEN P. RAGLAND
STEVEN P. RAGLAND

*Attorneys for Defendants
COINBASE, INC., BRIAN ARMSTRONG
and DAVID FARMER*

ATTESTATION

I hereby attest that I have obtained concurrence in the filing of this document from each of the other persons whose signatures are indicated by a conformed signature (/S/) within this e-filed document.

DATED: November 6, 2018

/s/ Robert S. Green
Robert S. Green

ORDER

Pursuant to stipulation, the following is ordered:

1. Plaintiff's Second Amended Class Action Complaint shall be filed on or before November 20, 2018;

2. Defendants' response, whether by answer or motion(s), shall be filed by December 20, 2018

3. Plaintiff's opposition(s) to Defendants' motion(s) shall be filed by January 17, 2018.

4. Defendants' reply brief(s) in support of their motion(s) shall be filed by January 31, 2019.

5. Defendants' motion(s) shall be scheduled for hearing on February 14, 2019, at 10:00 a.m.

IT IS SO ORDERED.

Dated: _____

Honorable Vince Chhabria
United States District Court